

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-60126-LEIBOWITZ/AGUSTIN-BIRCH

UNITED STATES OF AMERICA,

Vs.

JANICE ELEANOR TURNER and
KISEAN PAUL ANDERSON, a/k/a
SEAN KINGSTON,
Defendants.

**DEFENDANTS' MOTION FOR PERMISSION TO FILE REPLY BRIEF
AND EXHIBITS OUT OF TIME**

Defendants move this Honorable Court to permit the Defendants to file a reply brief and exhibits out of time and allege the following facts in support thereof:

1. The Order Setting Trial and Pretrial Schedule entered by this Honorable Court require that a reply brief must be filed by January 22, 2025.
2. Defendants seek this Court's permission to file a reply brief and exhibits after January 22, 2025.
3. The Defendant wish to file portions of the deposition of Detective Vecchio which was conducted on January 13th, 2025. The transcript of Detective Vecchio was just received on January 27th, 2025. Therefore it was not possible to file a reply brief and the deposition portions by this Court's deadline of January 22, 2025.

4. Defendants believe by granting this motion, it will assist the Court in deciding the Defendants' pending motion.

5. The Defendants have demonstrated good cause for the court to grant this motion.

The undersigned counsel, ROBERT A. ROSENBLATT, hereby certifies that he has conferred to AUSA Marc Anton in a good faith effort to resolve the subject matter of this motion. Mr. Anton has no objection to the relief sought by the Defendants. We thank AUSA Anton for his courtesy.

WHEREFORE the Defendants move for an order permitting the Defendants to file a reply brief out of time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with via e-portal and copied to: Marc S. Anton, AUSA, 500 East Broward Blvd., Suite 700, Ft. Lauderdale, Fl 33394, marc.anton@usdoj.gov, Tanya Okun at: tanya_okun@flsp.uscourts.gov and to trevor.jones@usdoj.gov this 31st day of January, 2025.

Respectfully Submitted,

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